

MEETING MINUTES

To: Distribution List
From: John Heller – MACTEC
Date: April 28, 2011
Subject: RCRA 2020 Goals and Strategy

MEETING DETAILS

Attendees:

USEPA: Hon Lee, Paul Gotthold

Honeywell: Rich Galloway

Sunoco: Paul Persing, Scott Cullinan, Martin Liebhardt

MACTEC: John Heller

The following provides a summary of the RCRA Corrective Measure progress update and next steps that were discussed during the meeting. Open items are followed by the action item for each:

Introductions

- USEPA introduced themselves to the group.
- Scott Cullinan of Sunoco introduced the Sunoco, Honeywell and MACTEC team. The purpose of the meeting was to provide a summary of cleanup progress over the last few years and begin a dialog with USEPA to achieve the Agency's RCRA 2020 goals of construction complete for the Frankford facility.

Progress and Submittal Status Update

- Semi-Annual Groundwater and LNAPL Collection Progress Reports continue to be submitted by Sunoco. The most recent corrective measures submissions to the USEPA were the Environmental Indicator reports in 2004. Environmental Indicator reports concluded that human exposure and contaminated groundwater migration were under control.
- Site cleanup has been focused on maximizing the effectiveness and efficiency of the operating LNAPL recovery system.
- Updated groundwater quality data maps and an updated LNAPL/DNAPL delineation map were distributed and reviewed. It was noted that with regard to protection of human health and the environment, the majority of the perimeter groundwater wells have no detections or estimated concentrations of the primary site pollutants (benzene, isopropylbenzene, and naphthalene). USEPA noted that offsite wells to the northwest of the site along Interstate 95 show benzene exceedances, (attributed to an active Lukoil retail service station). In addition USEPA noted that the area along Lefevre Street (MW-122) has detected elevated naphthalene concentrations.

Ongoing Data Gap Evaluation

- Historical data from prior site operations as well as environmental data from the 1990s forward is being reviewed to prepare a final Corrective Measures Study report.
- DNAPL area around MW-302 is identified as a data gap and an investigation is being planned to define the vertical and horizontal extent of the DNAPL. The fieldwork is tentatively planned to occur early this summer. Samples of the DNAPL will be collected to provide engineering data for a treatability study.
- Discussed the environmental setting of the facility along Interstate 95 and the 100+ years of manufacturing in this section of Philadelphia. For soils, discussed evaluating what areas of the site may represent potential source areas for groundwater contamination. In addition to the LNAPL plume area in the center of the facility, discussed the DNAPL observed in MW-302 and the naphthalene detected in MW-122 as two additional areas to evaluate.

ACTION: Additional characterization work and analysis to be performed in and around MW-122 and MW- 302.

RCRA 2020 Construction Complete Goal

- Discussed a tentative timeline to achieve construction complete by 2020. Conceptually, the cleanup plan will need to demonstrate that pollutants are contained on the property and would not migrate offsite. Removal of recoverable LNAPL should remain the major component of the cleanup plan.
- The Interim Remedial Measures could be implemented as a final remedy if the data indicates successful containment and recovery. Discussed the improvements made to the LNAPL collection system and the observations of the LNAPL plume that it is stable and appears to be diminishing in surface area.
- The Phase II RFI is still considered a draft, awaiting USEPA comments. Discussed some mechanisms to finalize the Phase II report, and whether a Phase II Addendum is warranted before USEPA finalizes comments.
- USEPA can move forward with their review as well as work toward the construction complete goal in 2020. USEPA will need to make a determination that contamination is contained onsite. USEPA will proceed to review the site data that has been submitted and provide comments/questions regarding what data gaps still need to be addressed. USEPA will give the team a couple of weeks to collect requested information and then set up a conference call and/or meeting.

ACTION: USEPA will review existing reports and will provide comments and questions on data gaps. A follow-up conference call or meeting will be scheduled to address the comments.

- Discussed one of the remedy components will be the placement of environmental covenants/restrictions and engineering controls on the property.

Other

- USEPA discussed the implementation of new software that will allow users to access site information through Google Earth. MACTEC recently submitted a .kml file to USEPA for another sit..

ACTION: MACTECc will create a .kml file with the Frankford Plant boundary and submit to the USEPA via email.

Distribution:

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